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January 17, 2012

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Application of SC Lifeline, Incorporated d/b/a ClearTalk for Designation as an Eligible
Telecommunications Carrier
Docket No. 2011-489-C

Dear Ms. Boyd:

ORS respectfully requests that all remaining filing deadlines and hearing in the referenced matter be held in abeyance until further notice. As the Commission is aware, the FCC issued Order 11-189 on December 23, 2011¹ (the "Order") which addresses how its recently amended section 54.101² affects Lifeline-only ETCs and their compliance with section 214(e)(1)(A) of the Act.³ The Order (attached) states that a Lifeline-only ETC does not meet the "own facilities" requirement if its only facilities are those used to provide functions such as access to operator service or directory assistance. It further states that those Lifeline-only carriers seeking ETC designation must either use their own facilities, in whole or in part, to provide the supported "voice telephony service" or obtain forbearance from the "own facilities" requirement from the FCC.

¹ Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011).

² USF/ICC Transformation Order revised section 47 C.F.R. § 54.101 to specify that "voice telephony service" is supported by federal universal service support mechanisms. FCC 11-161 (rel. Nov. 18, 2011).

³ 47 U.S.C. § 214(e)(1)(A) (stating that an ETC receiving federal universal service support shall, throughout its designated service area, offer services that are supported by federal universal service mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services).

The recently amended section 54.101 reads: "Services designated for support. Voice telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 or enhanced 911 systems; and toll limitation for qualifying low-income consumers (as described in subpart E of this part)."

ORS has requested additional information from the Company in an attempt to better understand its intentions for offering service in South Carolina. The Company and ORS would be afforded additional time to ascertain and review all requested information by holding the existing deadlines in abeyance.

The recent changes in eligibility requirements to receive federal universal support may directly affect the referenced matter. Additionally, the FCC has announced (attached) that Lifeline and Link Up reform will be on its January 31, 2012 tentative agenda.⁴ Therefore, ORS requests that all dates associated with this matter be held in abeyance in order for ORS to carefully consider how to proceed in an efficient manner.⁵ In the interest of judicial economy the parties and the Commission should move forward once all available and essential information has been considered.

We appreciate your consideration and attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Lessie Hammonds". The signature is fluid and cursive, with the first name "C." and last name "Lessie" clearly visible, followed by "Hammonds".

C. Lessie Hammonds

cc: John J. Pringle, Jr., Esquire (without attachment)

⁴ News Release: FCC Announces Tentative Agenda For January Open Meeting (rel. January 10, 2012).

⁵ The Order states that the FCC is anticipated to address the "own facilities" requirement for Lifeline providers in the near future.